National Park Service US Department of the Interior

Concession Environmental Management Program Denver, Colorado



Guidance for Writing an Emergency Action Plan (EAP)

(Planning for a Release of a Hazardous Substance)



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The National Park Service Concession Environmental Management Program does not make any guarantee or assume any liability with respect to the use of information in this guidance. It remains the sole responsibility of concessioners to review, understand and apply the appropriate federal, state and local regulations that govern this topic area. Additional consultation with qualified professionals or federal, state and local environmental agencies may be necessary to ensure a concessioner's program complies with applicable regulations.

For more information, contact the Concession Environmental Management Program:



GreenLine Technical Assistance Number 303/987-6913



GreenLine Email
NPS_GreenLine@nps.gov

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Purpose of This Guidance

This document provides an overview of the Emergency Action Plan (EAP) requirements developed by the Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.38. This document describes elements required in an EAP and provides a sample written EAP to address hazardous substance spill and release emergencies. If concessioners use this sample written EAP, all sections should be carefully reviewed and modified to make the plan specific to their facilities and services. In addition, concessioners should ensure that they are complying with the most recent federal, state, local, and park regulations and policies.

Who Should Read This Guidance

This guidance was written for National Park Service (NPS) concessioners that use or store hazardous substances and expect their employees to clean up incidental hazardous substance spills and releases. These concessioners and their employees understand that additional assistance is needed to clean up larger hazardous substance spills and releases. In general, chemicals labeled with the words "CAUTION," "WARNING," "DANGER," "POISON," or the skull and crossbones symbol are hazardous substances. These include common products found even in the smallest of concession operations, such as cleaning products, paints, oils, pesticides (such as wasp killer spray), and other applicable substances including bulk storage of gasoline and propane.

INCIDENTAL RELEASE (excerpt from OSHA's HAZWOPER FAQ)

An incidental release is a release of a hazardous substance that does not pose a significant safety or health hazard to employees in the immediate vicinity or the employee cleaning it up, nor does it have the potential to become an emergency within a short time frame. Incidental releases are limited in quantity, exposure potential, or toxicity and present minor safety or health hazards to employees in the immediate work area or those assigned to clean them up. An incidental spill may be safely cleaned up by employees who are familiar with the hazards of the chemicals with which they are working.

The Emergency Response Program (ERP) versus the Emergency Action Plan (EAP)

OSHA regulations specify two types of emergency plans for concessioners that use and/or store hazardous substances. They are an Emergency Response Program (ERP) and the EAP. Determining which plan is required depends upon the expected level of hazardous substance spill and release response.

Emergency Response Program (ERP)

Employers that expect their own employees to clean-up hazardous substance spills and releases that are **not considered incidental spills and releases** are required to have an ERP (29 CFR 1910.120(I)(1)(i)). ERP guidance is not provided in this document but can be found in the *Guidance for Developing an*

Emergency Response Program (ERP). Refer to the "Additional Assistance" section for information on how to obtain this guidance.

Emergency Action Plan (EAP)

If a facility has the potential for a hazardous substance spill and release greater than incidental amounts, employers should address emergency procedures in an EAP if they **do not allow** employees to clean up any hazardous substance spills and releases, or **only allow** employees to clean up **incidental hazardous substance spills and releases**.

Incidental spills and releases do not pose a significant safety or health hazard to employees cleaning up the spill or release. The volume of an incidental spill or release is dependent upon an employee's familiarity with the substance, the amount spilled or released, the toxicity of the material, and the environment in which the spill or release occurs.

Why is an EAP Needed for Hazardous Substances?

OSHA regulations contained in 29 CFR 1910.38 require employers to develop an EAP so that they have adequate plans in place to ensure employee safety in the event of an emergency in the workplace, such as fire, hurricanes, floods, tornadoes, or "other emergencies." Concessioners may already have an EAP in place concerning fire, hurricanes, and other events, but one such "other emergency" that is often overlooked in the EAP is a hazardous substance spill or release.

The appendix to 29 CFR 1910.38 states that an "emergency action plan should address emergencies that the employer may reasonably expect in the workplace. Examples are: . . .toxic chemical releases . . ." This is analogous to a hazardous substance spill or release.

As required in the Concession Contract, it is the responsibility of all NPS concessioners to provide a safe and healthful environment for employees and visitors. As such, most NPS concessioners are required to develop a Risk Management Program (RMP) that includes an Emergency Procedures section. Depending on each concessioner's type and scope of operations, the RMP may also include an Emergency Action Plan (EAP) in its Emergency Procedures section.

First Step: Coordinate with the Park and Determine Responsibilities

The concessioner should coordinate with the NPS to determine the concessioner's expected level of response for specific hazardous substance spills and releases. Based upon these discussions, the concessioner should develop its own EAP and/or an ERP, unless the park indicates that it will include the concessioner in park plans. If the concessioner is included in park plans, the concessioner should be involved in

developing and writing the park plans, ensure it has a copy of the park plans, and make sure concessioner employees understand the park plans and are appropriately trained.

The expected levels of hazardous substance spill and release response, and corresponding concessioner and park responsibilities should be documented in the Concession Contract and/or Operating and Maintenance Plans.



A key element to a well-designed and effective concessioner EAP is a description of how it is integrated with and/or supports the park's emergency plan(s). It is a recommended Best Management Practice (BMP) that the concessioner coordinate with park concession staff, the park safety officer, and other appropriate park staff as it develops, documents, and implements its EAP. This will help ensure that the park and concessioner clearly understand each other's responsibilities and procedures and how they relate.

Second Step: Understanding Emergency Action Plan (EAP) Requirements



The EAP must be documented and made available to all employees unless an employer has 10 or fewer employees. Under OSHA regulations, employers with 10 or fewer employees need not maintain a written plan, but must at least discuss the EAP with their employees. It is a recommended BMP that employers with 10 or fewer employees still document their EAP. A Park Risk Management Program and/or Concession Contract may include more stringent concessioner responsibilities and/or documentation requirements.

The OSHA regulations identify EAP requirements in four (4) specific areas:

1. Minimum Emergency Planning Information

There are six (6) minimum elements that should be covered in an EAP:

- a) Emergency escape procedures and emergency escape route assignments. Employees should be assigned a particular emergency escape route and should proceed to a designated safe area during an emergency evacuation. The designated safe area may be a parking lot, open field, street, or other area, as long as it is located away from the site of the emergency and has adequate space to accommodate all employees. Employees should also be instructed not to congregate around emergency escape exits. Colored floor plans and workplace maps can show and assist employees in understanding how they should exit a building or area and where employees should assemble in the event of an emergency.
- b) A list of employees who remain during an emergency to operate <u>critical</u> operations before evacuating, and the procedures they should follow. Critical operations may include, but are not limited to, monitoring power supplies, monitoring water supplies, and other essential services that cannot

- be shut down for every emergency alarm. If there are any employees who remain during an emergency to operate critical operations, it should be stressed that they can evacuate when absolutely necessary to ensure their own personal safety. Not all businesses have critical operations.
- c) A method for accounting for all employees after an emergency evacuation. It is important for a concessioner to be able to apprise emergency crews of individuals who may still be in the building. Guidance suggests that a concessioner should assign one (1) "warden" for every twenty (20) employees. Wardens should be aware of who is at work and who is absent. Wardens should instruct groups of employees in steps to take during an emergency and should check rooms before evacuating themselves to ensure all employees have left the building.
- d) A list of employees who are designated and permitted to perform rescue and medical duties.
- e) The preferred process to report fires and other emergencies. A concessioner can report emergencies to its employees in a variety of ways, such as an intercom, automated alarm, or phone system. Employees should be trained on how they will be notified of particular emergency situations. For example, a fire alarm may be used to alert employees about fire and an intercom may be used to alert employees about other emergency situations. The reporting process for hazardous substance releases should be included in the concessioner's procedures.
- f) A list of names or job titles of individuals who can be contacted for more information about the EAP.

2. An Established Alarm System

The alarm system (either audible or visual) should alert employees to evacuate their immediate work area or their workplace. The alarm system should be capable of alerting employees of the emergency, regardless of the ambient noise and/or light levels in each employee's work area. Tactile devices may be used to alert those employees who would not otherwise be able to recognize the audible or visual alarm.

Only OSHA-approved alarm systems can be installed. They must be in working condition at all times, except when being repaired.

Alarm system testing should occur at least once every two months. A back-up system, such as employee runners or telephones, should be available when the main system is out of service.

OSHA guidance indicates that if an employer has 10 or fewer employees, the "alarm system" can simply be employees shouting at one another as long as all employees can be alerted in this manner.

3. Evacuation Procedures

Employers must specify the evacuation procedures that should be used in emergency situations. Evacuation procedures may vary, depending on the type of emergency.

4. Training

The employer must review the EAP with all employees covered under the plan. Training must occur initially when the plan is developed, whenever an employee's responsibilities or designated actions under the plan change (including when hired), or whenever the plan is changed.

The employer should designate and train "wardens" to assist in evacuating employees during emergency situations (see 1c above). Wardens should know, prior to an emergency situation, the whereabouts of individuals they are assigned to oversee. They should be familiar with the layout of the workplace, and be familiar with alternative escape routes from the workplace in case the preferred emergency escape route is blocked. They should be aware of the special needs of physically challenged employees and have procedures to assist them during emergency situations. Lastly, wardens should check rooms to ensure that there are no employees who have been left behind prior to evacuating the workplace themselves, and should be responsible for accounting for all their assigned individuals upon evacuation to safe areas.

Third Step: Developing and Implementing the EAP

A well-documented EAP should clearly define the company policy and procedures in responding to hazardous substance spills and releases in addition to emergencies specified in the regulation and other relevant emergencies. The following steps are recommended to develop an effective, OSHA-compliant EAP that addresses potential hazardous substance spill and release emergencies:

Hazardous Substance Release Assessment

A concessioner should assess the types of hazardous substances stored and used at concessioner facilities and determine incidental spill or release amounts for employees. (Incidental spill or release amounts may differ by employee; for example, the incidental threshold amount for gasoline may be larger for a fuel attendant employee than a service station cashier since the fuel attendant works more closely with fuel, and may be more familiar with the fuel's hazard characteristics.) A concessioner should consider the hazard characteristics (e.g., toxicity, flammability, or other characteristics found on a material safety data sheet) and the amount of hazardous substance stored and used in this assessment. A concessioner should also consider other workplace hazards that could complicate a hazardous substance spill and release, such as the presence of ignition sources.

Hazardous Substance Release Response Procedures

Based on the hazardous substance release assessment, the EAP should clearly identify the concessioner's hazardous substance incidental spill and release response policy and procedures. It should indicate whether employees <u>can</u> or <u>cannot</u> clean up incidental hazardous substance spills and releases. If employees are allowed to stop and/or clean up incidental hazardous substance spills and releases, the EAP should clearly state which employees can take this type of action, for what substances, and how this response will be carried out.

The EAP should also indicate that employees are **NOT** permitted to stop and/or clean up hazardous substances that are larger than an incidental spill. Instead, the EAP should describe how employees should evacuate the area and immediately contact trained emergency response personnel for further action if releases larger than an incidental spill occur. The EAP evacuation procedures may include the designation of "wardens" with specialized training and responsibilities to assist in evacuating other employees and for ensuring that all employees are accounted for during the procedure.

Employee Training

EAP training should be conducted for all employees and should cover EAP policies and procedures. Training must occur initially when the plan is developed, whenever an employee's responsibilities or designated actions under the plan change (including when hired), or whenever the plan is changed. It is a recommended BMP that EAP training take place at least annually to ensure all employees are familiar with EAP requirements.

The concessioner can designate and train "wardens" to assist in evacuating employees during emergency situations.

Monthly safety meetings are a good opportunity to introduce and train employees on the EAP. The EAP could also be addressed during routine Hazard Communication training.

Maintaining Both an EAP and an ERP

In some cases, a concessioner may need to comply with both EAP and ERP requirements. This situation arises when a concessioner will respond to nonincidental spills and releases for some hazardous substances (e.g., fuel) but not for other hazardous substances (e.g., cleaning chemicals). Instead, concessioners may evacuate and call for additional assistance to stop and cleanup these "other" hazardous substances. In this example, a concessioner is required to have an **ERP** to address procedures related to fuel spill and release response, and an **EAP** to address procedures related to cleaning chemical spill and release response. EAP requirements would also apply to other emergencies such as fire, floods, and hurricanes.



To avoid redundancy, regulators allow concessioners to develop a single plan instead of multiple emergency response plans. This single plan is formally called an Integrated Contingency Plan (ICP). There is no set format in developing an ICP. However, there is a sample format that could be used in the ICP Guidance (refer to the "Additional Information" section). The ICP must meet all the regulatory requirements for the individual plans (e.g.,

If a concessioner decides to prepare an ICP in place of an EAP and ERP, it should ensure that it includes all regulatory requirements under both plans, and that the plan clearly defines the appropriate procedures for each situation.

EAP and ERP) that are incorporated. It is helpful to include a section at the beginning of the ICP that identifies where each regulatory-mandated topic (e.g., OSHA EAP requirements and OSHA ERP requirements) is located in the plan.

Additional Information

Resource Type	Name	Description	Source
phone number	OSHA HelpLine	Provides regulatory assistance	OSHA 301/515-6796
website	29 CFR 1910.38(a)	Regulations on developing and implementing the EAP	OSHA www.osha.gov, click on "Regulations," and find 29 CFR !910.38(a)
website	Inspection Procedures for the Hazardous Waste Operations and Emergency Response Standard, 29 CFR 1910.120 and 1926.65, Paragraph (q): Emergency Response to Hazardous Substance Releases	Guidance on interpreting 29 CFR 1910.38(a)	OSHA www.osha.gov, search for "Inspection Procedures for the Hazardous Waste Operations and Emergency Response Standard, 29 CFR 1910.120 and 1926.65, Paragraph (q): Emergency Response to Hazardous Substance Releases," go to Appendix E
document	EnviroCheck Sheet: Emergency Response Planning and Reporting	Multi-page document used as a tool during NPS environmental audits	NPS Concession Environmental Management Program GreenLine Technical Assistance Number 303/987-6913
website	"One Plan"/Integrated Contingency Plan	Information on the Integrated Contingency Plan (ICP)	US EPA www.epa.gov/region1/steward/e merplan/oneplan.html
document	Guidance for Writing an Emergency Response Program	Guidance written specifically for concessioners on writing an Emergency Response Program	NPS Concession Environmental Management Program GreenLine Technical Assistance Number 303/987-6913

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Concession Environmental Management Program Denver, Colorado



Appendix:

Sample Written Emergency Action Plan (EAP)

Background: This sample written EAP should be customized to address the size and scope of the concessioner's facilities and services. It was written for concessioners that use or store hazardous substances, and that expect their employees to respond **only** to nonincidental hazardous substance releases. The plan describes procedures to address this specific type of emergency. To comply with OSHA requirements, remember to include information related to fire and other emergencies such as those for floods, hurricanes, and tornadoes, in your EAP, if applicable.

This EAP was written for a small horse stable with less than ten employees. The Concession Contract assigns one aboveground fuel storage tank to the concessioner. The concessioner uses this tank for fueling vehicles used to transport horses. The concessioner is responsible for maintaining and operating the fuel tank.

If a concessioner has coordinated spill cleanup procedures with the park and it has been determined that the concessioner is expected to have its own employees clean-up hazardous substance spills and releases that are **not considered incidental releases** an Emergency Response Program (ERP) is required per 29 CFR 1910.120(I)(1)(i). ERP guidance is not provided in this document but can be found in the *Guidance for Developing an Emergency Response Program (ERP)*.

Emergency Action Plan for Bill's Horse Stables

Introduction: This Emergency Action Plan (EAP) is prepared for Bill's Horse Stables to describe procedures to be taken by our employees in the event of a hazardous substance release (e.g., spill or leak). This EAP is prepared in accordance with Section 29 of the Code of Federal Regulations (CFR) Part 1910.38 and in accordance with our NPS Risk Management Program requirements.

The plan was developed in coordination with the park. A copy of this EAP has been shared with the park Safety Officer and Concession Specialist. The park will follow its own Emergency Response Program procedures to respond to any concessioner-reported release of a hazardous substance.

Hazardous Substance Release Risk Assessment: The use or storage of hazardous substances at our facilities in the park is limited. Bill's Horse Stables uses nonhazardous products whenever possible for janitorial and maintenance activities and horse care. These products are not commonly stored or handled in bulk quantities (e.g., in volumes greater than five gallons). Of those hazardous substances used and stored at Bill's Horse Stable facilities in the park, only the 2000-gallon aboveground gasoline storage tank has the potential to result in a hazardous substance release greater than that which can or should be handled by Bill's Horse Stables' staff. Other hazardous substances maintained on the premises, if released, would only result in "incidental" spills. It has been determined that such incidental spills would not pose a significant safety or health hazard to employees cleaning up the spill and that they could be safely cleaned up by appropriately trained staff.

Hazardous Substance Release Policy: Bill's Horse Stables <u>requires</u> its employees to clean up <u>incidental</u> releases of hazardous substances. Incidental releases consist of the following:

- Releases of all products (e.g. cleaning chemicals, horse care chemicals, veterinary medicines) used at Bill's Horse Stables, except fuel, from containers of less than five gallons in size; and
- Releases of fuel in quantities of less than two gallons (from the fuel storage tank or dispenser pump),

Employees are <u>prohibited</u> from cleaning up <u>nonincidental</u> releases. Nonincidental releases include:

- Gasoline releases in excess of two gallons from the fuel storage tank or dispenser pump;
- Releases from hazardous substances of unknown identity;
- Releases of hazardous substances in exceptionally large quantities (e.g. larger than five gallons);
- Releases of hazardous substances that are extremely toxic in small amounts.
 (None of these chemicals have been identified at Bill's Horse Stables.)

 Incidental releases when unusual hazards exist that cannot be safely controlled (e.g., ignition sources);

EAP Emergency Responsibilities: Bill's Horse Stables has established the following EAP responsibilities:

Person	Responsibilities
Person in- Charge (Bill Smith, Owner)	 Person-in-Charge in the event of an emergency and/or designates Alternate Person-in-Charge; Notifies the park and other emergency response agencies for assistance in the event of a nonincidental hazardous substance release; Coordinates with any emergency response agencies; Shuts down critical operations (i.e., fuel tank dispenser) (see below); Provides rescue and medical duties if necessary; Acts as evacuation warden; Prepares and submits any hazardous substance release reports to the park and other agencies.
Alternate Person-in- Charge (Jake McIntryre)	 Serves in the capacity of the Person-in-Charge (i.e., owner) when designated except for preparing any hazardous substance release reports; Contacts owner as well as the park and other emergency response agencies in the event of a nonincidental hazardous substance release.
Stable Hands (Jake McIntyre and Sally Brown) All Employees	 Shuts down critical operations (i.e., fuel tank dispenser) (see below); Provide rescue and medical duties if necessary; Act as evacuation wardens. Understand and execute the company EAP hazardous substance release policies and procedures;

Contact information is found on the last page of this document (i.e., along with the site map).

EAP Procedures: Bill's Horse Stables has established emergency response procedures for incidental and nonincidental releases of hazardous substances.

Incidental Releases

- Alert other employees in the area of the emergency.
- Determine if anyone has been contaminated or hurt and provide assistance as authorized.
- Secure the scene (e.g., remove customers and unnecessary employees).
- Assess the situation (e.g., are there any unusual hazards that can not be dealt with safely, is the chemical and its associated hazards known, is the release

incidental, are available personnel qualified to clean up and/or contain the release).

WHEN IN DOUBT, DO NOT TRY TO RESPOND.

- Eliminate any unusual hazards if they can be dealt with safely (e.g., remove ignition sources).
- Ensure responders wear proper personal protective equipment.
- Clean up the release in accordance with procedures on Material Safety Data Sheet (MSDS).
- Properly dispose clean-up materials in accordance with MSDS and state and federal requirements.
- Notify Mr. Smith or the Alternate Person-in-Charge of incident.

Nonincidental Releases

DO NOT TRY TO RESPOND TO THE RELEASE (I.E., DO NOT CLEAN UP OR STOP THE RELEASE).

- Alert other employees and Mr. Smith (or the Alternate Person-in-Charge) of the emergency.
- Determine if anyone has been contaminated or hurt and provide rescue and other assistance if and only if it can be carried out safely.
- Shut down critical operations if any only if they can be carried out safely (see below).
- Evacuate the area.
- Proceed directly to the designated safe area (i.e., oak tree 500 feet northwest of the stable).
- Wait for instructions from Mr. Smith or the Alternate Person-in-Charge.

Emergency Escape Routes: Employees should exit using the closest available open door. Since none of Bill's Horse Stables' facilities have multiple stories and there are no barriers outside the building windows, employees can jump out of the windows as an emergency escape route, as a last resort. Employees should not congregate around emergency exits. Floor plans complete with emergency escape routes and the designated safe area are included in the EAP and are posted in the employee staff area.

Based on park recommendations, Bill Smith or the Alternate Person-in-Charge will evacuate the horses during any emergency situation. Other employees will not be asked to participate in the evacuation of horses to ensure their personal safety.

Employees Who Can Operate Critical Operations Before Evacuating: In the event of a major spill or leak from the fuel tank dispenser, the owner or stablehand(s) shall shut off the power to the pump using the emergency shut off switch before evacuating, provided that the switch can be accessed safely. There are no other critical operations at Bill's Horse Stables. Therefore, employees should not otherwise stay behind in the event of a nonincidental release of a hazardous substance.

Accounting for Employees During an Emergency: Bill Smith, owner of Bill's Horse Stables, is responsible for ensuring that all employees are accounted for. The owner and the two stable hands will also act as "wardens" to help ensure that all employees have been safely evacuated in the event of an emergency.

Employees Who Can Perform Rescue and Medical Duties: Bill Smith, owner of Bill's Horse Stables, is permitted to perform rescue and medical duties up to the abilities in which he has been trained. The two stable hands, who are required to have completed first aid training upon hire, are also permitted to perform rescue and medical duties up to the abilities to which they have been trained.

Alarm System and Reporting Emergencies: Since facilities are less than 100 feet from each other (i.e., the administrative office and the stables), verbal communication is the fastest and preferred way in which to report emergencies between staff. The owner and staff also maintain two-way radios that will be used if verbal communication is not possible or effective. The owner is available via cell phone when off-site. The owner can also be contacted via his home phone if an emergency occurs after hours. At least every two months, cell phones and the two-way radios are tested to ensure they are functioning properly.

The owner (Mr. Smith), or the Alternate Person-in-Charge, will be informed of any hazardous substance release in accordance with the company release response procedures. Mr. Smith or the Alternate Person-in-Charge is responsible for contacting the Park Dispatch Office for response assistance if a nonincidental spill occurs. The Park Dispatch Office will also be advised of the emergency via phone or radio, if possible. Otherwise, an individual will immediately drive to park administrative offices (which are less than five miles away) and advise the park of the emergency in person.

As requested by the park, the owner (Mr. Smith) or the Alternate Person-in-Charge will coordinate with other emergency response agencies. The owner (Mr. Smith) or the Alternate Person-in-Charge will also coordinate with other emergency response agencies if such agencies arrive onsite prior to the concessioner being able to contact the park.

The owner (Mr. Smith) will prepare a report on all incidental and nonincidental hazardous substance releases that describe how the release occurred, how it was addressed and what has been done to prevent the event from reoccurring. Reports will be submitted to the Park Safety Officer and Park Concession Specialist, within 24 hours of the occurrence.

EAP Training: A mandatory safety meeting will be conducted at the beginning of each operating season (i.e., April) for all employees. At this time, Bill Smith, owner of Bill's Horse Stables, will review the EAP with employees. An attendance list for the training will be generated and maintained in the Bill's Horse Stables training files located in the Administrative office. Bill Smith will train new employees hired after the initial annual meeting on the EAP within one week of hire. A copy of the EAP is available in the

Administrative office and a copy is posted in the stable for employee reference. At least once annually, an evacuation drill and an incidental spill response field exercise will be conducted.

For More Information About the EAP: Bill Smith, owner of Bill's Horse Stables, can be reached for more information about the EAP, at 917/235-3333.

Approved, effective this day of MAY 15, 2002

BILL'S HORSE STABLES

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UNITED STATES OF AMERICA

Superintendent

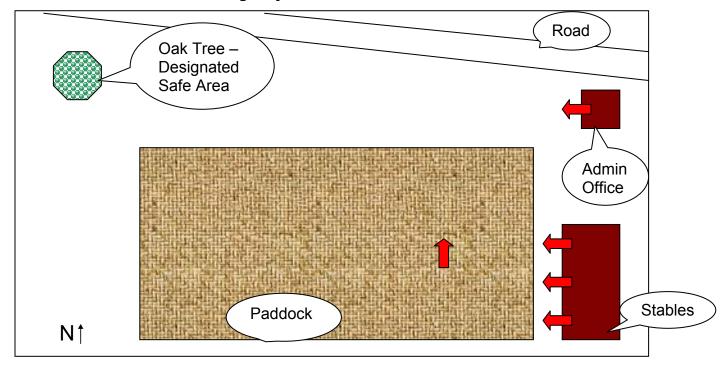
Beautiful National Park

EMERGENCY CONTACT NUMBERS: (List is posted in the Admin Office and Stables)

National Park Service Dispatch: 917/235-0001
National Park Service Superintendent: 917/235-0002
Fire Department: 917/235-2222
Ambulance: 917/235-3333

Bill Smith (Home Phone): 917/235-7263 Bill Smith (Cell Phone): 917/706-5472

SITE PLAN. Arrows are emergency exits.



Amendment 1. Approval Date:	
BY: Owner	BY: Superintendent, Beautiful National Park
Amendment 2. Approval Date:	
BY: Owner	BY:Superintendent, Beautiful National Park